

#### IV. REMARKS

1. The specification, claims and drawings are amended. Claims 10-20 are new. Claim 7 is cancelled without prejudice.

2. The specification is amended to add reference signs. FIGS. 2, 3 and 4 are proposed to be amended to delete unnecessary or redundant reference signs.

3. Claim 8 is amended to address the 35 U.S.C. §101 rejection.

4. Claims 1-6 and 9 are not anticipated by Dimitrova et al. ("Dimitrova") under 25 U.S.C. §102(b). The "reference plane" in Applicant's invention is a plane on which positions and motion of objects are described independently of camera motion. In typical cases, "reference plane" represents a ground for determining positions of objects of the "real world." An example of it is a soccer field on which objects (players and a ball) exist and move. The motion of an object is described and recorded as the trajectory on the reference plane and is independent of the camera motion. Therefore, the user of Applicant's invention can search video scenes based on positions of the real world, e.g. "scenes in which a player of the team of the right side is moving to the left" and "scenes in which the ball is crossing the center line."

On the other hand, what is disclosed in Dimitrova is motion compensation on video frames. Therefore, the description of motion of an object depends on camera motion. For example, in a video sequence of a soccer game, suppose that a player is moving to the left on the soccer field. If the camera moves to the left

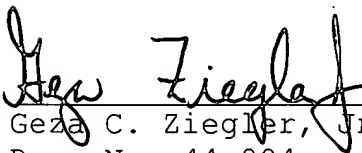
faster than the player, the player moves relatively to the "right" on the video frames. In such a system, the user cannot search video scenes as described above.

The remaining independent claims recite similar subject matter and should also be allowable for the reasons stated above.

For all of the foregoing reasons, it is respectfully submitted that all of the claims now present in the application are clearly novel and patentable over the prior art of record, and are in proper form for allowance. Accordingly, favorable reconsideration and allowance is respectfully requested. Should any unresolved issues remain, the Examiner is invited to call Applicants' attorney at the telephone number indicated below.

The Commissioner is hereby authorized to charge \$420.00 for a two month extension, together with any further fees associated with this communication or credit any over payment to Deposit Account No. 50-0510.

Respectfully submitted,

  
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Reg. No. 44,004

25 FEB 2004  
Date

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